

# **EXHIBIT A**

**Plaintiff's Exhibit List & RRI Defendants' Objections**

**ATTACHMENT G-1 PLAINTIFF'S EXHIBIT LIST WITH DEFENDANT'S OBJECTIONS**

<b>PX NO.</b>	<b>Bates. No.</b>	<b>Date</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendant's Objections</b>
1	Moyer P4 Plaintiff H.B. 000151-53	January 19 2012	Gwinnett County Police Department Incident Report	Deposition Exhibit- Jay Moyer <i>H.B. v. Red Roof Inns, Inc. et al.</i>	Hearsay within report
2	5523	Unknown	DSCN1457	Photograph- Skii Morris	No objection
3	5524	Unknown	DSCN1458	Photograph- Skii Morris	No objection
4	5525	Unknown	DSCN1459	Photograph- Skii Morris	No objection
5	5527	Unknown	DSCN1461	Photograph- Skii Morris	No objection
6	5528	Unknown	DSCN1462	Photograph- Skii Morris	No objection
7	5529	Unknown	DSCN1463	Photograph- Skii Morris	No objection
8	5533	Unknown	DSCN1474	Photograph- Skii Morris	No objection
9	5534	Unknown	DSCN1475	Photograph- Skii Morris	No objection
10	5539	Unknown	[REDACTED]	Photograph- [REDACTED]	No objection
11	5540	Unknown	[REDACTED] Pic 3 001	Photograph- [REDACTED]	No objection
12	5542	Unknown	[REDACTED] 001	Photograph- [REDACTED]	No objection
13	5778	Unknown	100_0563	Photograph	No objection
14	5794	Unknown	Photo of [REDACTED]	Photograph	No objection
15	5795	Unknown	Photo of [REDACTED]	Photograph	No objection
16	5541	Unknown	[REDACTED] Pic 2 001	Photograph- [REDACTED]	No objection

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17	2027-2032	2010-2012	Calls for Service - 5171 BHP	Police Records	Irrelevant (Evid.R. 401) and unfairly prejudicial (Evid.R. 403) as to crimes not related to human trafficking; irrelevant as to time (post-trafficking); Improper character evidence (Evid. R. 404(a)(1)); hearsay
18	2192–2195	2010–2012	Case Reports - 5171	Police records	Irrelevant (Evid.R. 401) and unfairly prejudicial (Evid.R. 403) as to crimes not related to human trafficking; irrelevant as to time (post-trafficking); Improper character evidence (Evid. R. 404(a)(1)); hearsay

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19	2617–2618	2008–2012	Incident Report List- RRI Norcross 5171 Brook Hollow Parkway	Police Records	Irrelevant (Evid.R. 401) and unfairly prejudicial (Evid.R. 403) as to crimes not related to human trafficking; irrelevant as to time (post-trafficking); Improper character evidence (Evid. R. 404(a)(1)); hearsay
20	3351–3358	2008–2012	Record List 1- RRI Norcross 5171 Brook Hollow Parkway	Police Records	Irrelevant (Evid.R. 401) and unfairly prejudicial and cumulative (Evid.R. 403) as to crimes not related to human trafficking; irrelevant as to time (post-trafficking); Improper character evidence (Evid. R. 404(a)(1)); hearsay

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21	3437–3438	2008–2012	Record List 2- RRI Norcross 5171 Brook Hollow Parkway	Police Records	Irrelevant (Evid.R. 401) and unfairly prejudicial (Evid.R. 403) as to crimes not related to human trafficking; irrelevant as to time (post-trafficking); Improper character evidence (Evid. R. 404(a)(1)); hearsay
22	3449–3929	2008–2012	Incident Reports- Norcross PD ORR Response- RRI Norcross 5171 Brook Hollow Parkway	Police Records	Irrelevant (Evid.R. 401) and unfairly prejudicial and cumulative (Evid.R. 403) as to crimes not related to human trafficking; irrelevant as to time (post-trafficking); Improper character evidence (Evid. R. 404(a)(1)); hearsay

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23	5339-5346	2008-2012	CAD Notes- RRI Norcross 5171 Brook Hollow Parkway	Police Records	Irrelevant (Evid.R. 401) and unfairly prejudicial and cumulative (Evid.R. 403) as to crimes not related to human trafficking; irrelevant as to time (post-trafficking); Improper character evidence (Evid. R. 404(a)(1)); hearsay
24	5571-5572	2010-2012	5171 Brook Hollow Pkwy	Police Records- Calls for service	Irrelevant (Evid.R. 401) and unfairly prejudicial and cumulative (Evid.R. 403) as to crimes not related to human trafficking; irrelevant as to time (post-trafficking); Improper character evidence (Evid. R. 404(a)(1)); hearsay

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25	737-815	March 7 2011– March 9 2012	5171 Brook Hollow Pkwy	Police CADS	Irrelevant (Evid.R. 401) as to crimes and incidents not related to human trafficking; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R. 404(a)(1))
26	5772-5773	February 21 2010	Man accused of trafficking _ Archive _ gwinnettdailypost.com	News article	Irrelevant (Evid.R. 401) and unfairly prejudicial and cumulative (Evid.R. 403) as it involves crimes not related to human trafficking; improper character evidence (Evid.R. 404(a)(1)); hearsay
27	5774-5776	July 31 2007	Prostitution Crackdown in Gwinnett Village	News article	Hearsay
28	RRI_WK_380 55-38077	March, 2012	Anti-Trafficking Flyer		Irrelevant (Evid.R. 401) as to time.

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29	HB_NDGA_R ED_ROOF_1 621-1628		Franchise Agreement between Red Roof Franchising, LLC and FMW RRI OPCO, LLC		No objection
30	559	July 9 2021	Norcross Police Department- Certificate of Authenticity- Gwendolyn Franklin- Norcross RRI	Certification	No objection
31	2204		CERTIFICATE OF AUTHENTICATION OF RECORDS	Certification	No objection
32	Galbraith 002		Relationships Between RRI Entities (Simplified)	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	No objection
33A	Galbraith 003 HB_NDGA_R ED_ROOF_0 0000439-707	November 1 2011	Lease Agreement between FMW RRI I, LLC and FMW RRI OPCO, LLC	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	No objection

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33	HB_NDGA_R ED_ROOF_0 0000439, 455, 492, 662-663	November 1 2011	Lease Agreement between FMW RRI I, LLC and FMW RRI OPCO, LLC Excerpt		No objection
34	Galbraith 004 HB_NDGA_R ED_ROOF_0 0001505-1617	August 25 2011	Property Management Agreement between FMW RRI OPCO, LLC and RRI West Management, LLC	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	No objection
35	Galbraith 007 HB_NDGA_R ED_ROOF_0 0000195-214	March 22 2001	Security Services Agreement between Wackenhut Corporation and Motel 6 Operating, L.P.	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	No objection
36	Galbraith 008 HB_NDGA_R ED_ROOF_0 0000194	July 15 2011	Red Roof Inn No. 10166- Norcross Georgia Site Specific Addendum	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	No objection
37	Galbraith 009	May 3 2022	Vittatoe Deposition Excerpt	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	Hearsay; irrelevant (Evid.R. 401)

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38	Galbraith 010 Plaintiff H.B. 005517-55200	February 10 2023	Chuck Warbington Affidavit	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	Hearsay
39	Galbraith 011 Plaintiff H.B.005514- 5516	February 21 2023	Declaration of Jon Doherty	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	Hearsay
40	Galbraith 012 Plaintiff H.B. 002615-2616	November 30 2022	Affidavit of Erin Richardson	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	Hearsay
41	Galbraith 014 HB_NDGA_R ED_ROOF_0 0000010-11, 26-28, 31-2, 74-81, 95	December, 2010	Red Roof Inn Emergency Response Plan	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	No objection
42	Galbraith 015 Plaintiff H.B. 000769- 000771	August 8 2011	8/31/2011 Gwinnett County Incident Report	Deposition Exhibit- 30(b)(6) <i>H.B. v. Red Roof Inns, Inc. et al.</i>	
43	DrAbigailJudg e_5	March 22 2023	Clinician-Administered PTSD Scale for DSM- 5 (CAPS-5)	Deposition Exhibit- Dr. Abigail Judge	No objection

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				<i>H.B. v. Red Roof Inns, Inc. et al.</i>	
44	Moyer P1	March 18 2022	Transcript of James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Deposition Exhibit- James Moyer <i>H.B. v. Red Roof Inns, Inc. et al.</i>	Hearsay
45	Moyer P2		Photographs of Norcross RRI	Deposition Exhibit- James Moyer <i>H.B. v. Red Roof Inns, Inc. et al.</i>	No objection
46	Moyer P3	July 31 2007	Atlanta Journal Constitution Article	Deposition Exhibit- James Moyer <i>H.B. v. Red Roof Inns, Inc. et al.</i>	Hearsay, Authentication
47	Moyer 106 RRI_WK_000 01779-1790	January 17 2008	Security Services Agreement	Deposition Exhibit- James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Duplicate; no objection
48	Moyer 107 RRI_WK_000 11787 – 11846	November 29 2010	E-mail Chain	Deposition Exhibit- James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	No objection

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49	Moyer 110 Disco ID 88061-1 to 4		Dekalb County Police Department Incident Report	Deposition Exhibit- James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401) as to location, time, and crime; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R.404(a)(1))
50	Moyer 111 DISCO ID 81408-1 to 4		Incident/Investigation Report	Deposition Exhibit- James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401) as to location, time, and crime; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R.404(a)(1))
51	Moyer 114 RRI_EF_0000 7425–7426	November 12 2013	Dos and Donts Email	Deposition Exhibit- James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401) as to time (post-trafficking)
52	Moyer 115 RRI WK 00004955	November 15 2013	Email from Jay Moyer to Mike Murphy and Patrick Bonner	Deposition Exhibit- James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401) as to time (post-trafficking) and location

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53	Moyer 117 RRI_WK_000 04871-4873	August 17 2012	Email chain from Jay Moyer to 10130	Deposition Exhibit- James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401) as to time (post- trafficking) and location
54	Moyer 120 RRI_WK_000 04883-4886	October 22 2012	Email from Jay Moyer to Stephanie Doherty	Deposition Exhibit- James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401) as to location and time; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R. 404(a)(1))
55	Moyer 127 RRI_WK_495 7-4958	April 26 2015	Email chain from Jay Moyer to 10130	Deposition Exhibit- James Moyer <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401) as to location and time; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R. 404(a)(1))
56	Stocker 204	April 8 2022	Deposition Notices	Deposition Exhibit- Greg Stocker 30(b)(6) <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401); not evidence

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57A	Stocker 205 RRI_WK_000 11168– 11306	December, 2010	RRI Policy and Procedures	Deposition Exhibit- Greg Stocker 30(b)(6) <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Duplicate; no objection
57	RRI_WK_000 11168, 11261- 11262, 11247- 11248	December, 2010	RRI Policy and Procedures Excerpt	RRI Prostitution Policy; RRI Narcotics and Drug Use Policy	Irrelevant (Evid.R. 401) as to assaults and drug policy
58A	Park Exhibit No. 342 RRI 011695– RRI 011994	2009-2010	Consolidated Financial Statements	Deposition Exhibit- John Park 30(b)(6) <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid R. 401); unfairly prejudicial (Evid.R. 403)
58	RRI 011695, 011734, RRI 011739	2009-2010	Consolidated Financial Statements Excerpt		Irrelevant (Evid.R. 401); unfairly prejudicial (Evid.R. 403)
59	Vittatoe 195 RRI_WK_000 01752– RRI_WK_000 01778	December, 2010	GM Training Presentation- Safety and Security Presentation	Deposition Exhibit- Vince Vittatoe <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	No objection

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60	Vittatoe 196 RRI_WK_000 11787-11817	November 29 2010	Wehrle Safety and Security Training Email	Deposition Exhibit- Vince Vittatoe <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	No objection
61	Vittatoe 198	March 21 2008	Detroit News Article	Deposition Exhibit- Vince Vittatoe <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401) as to location and time; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R. 404(a)(1)); hearsay
62	Wehrle 324 VARAHI0000 57-631	August, 2011	General Managers' Guide	Deposition Exhibit- Michelle Wehrle <i>W.K., et al. v. Red Roof Inns, Inc., et al.</i>	Irrelevant (Evid.R. 401) as to location, subject, and time.
63	HB_NDGA_R ed_Roof_1689		RRI166 Atl Indian Trail Jan-12 TTM	D079	
64	RRI_WK_000 04866		NR 6 months 2012	D082	Irrelevant (Evid.R. 401) as to other properties and to elements of Plaintiff's TVPRA claim; unfairly prejudicial (Evid.R.

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					403); improper character evidence (Evid.R. 404)
65	RRI_WK_000 04867- RRI_WK_000 04868		District 11 2012 Quality Results	D086	Irrelevant (Evid.R. 401) as to other properties and to elements of Plaintiff's TVPRA claim; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R. 404)
66	RRI_WK_000 04870		District 11 May 2012 Analysis	D087	Irrelevant (Evid.R. 401) as to other properties and to elements of Plaintiff's TVPRA claim; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R. 404)
67	RRI_WK_000 53510		October 20, 2008 Medallia Review	D094	No objection

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68	RRI_WK_000 53511- RRI_WK_000 53514		November 14, 2008 Email Correspondence	D095	No objection
69	RRI_WK_000 69571- RRI_WK_000 69572		Incident Report	D096	Irrelevant (Evid.R. 401) as to time
70	RRI_WK_000 04870		District 11 2012 Analysis	D099	Irrelevant (Evid.R. 401) as to other properties and to elements of Plaintiff's TVPRA claim; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R. 404)
71	RRI_WK_000 04867 - 4868		District 11 2012 Quality Results YTD	D101	Irrelevant (Evid.R. 401) as to other properties and to elements of Plaintiff's TVPRA claim; unfairly prejudicial (Evid.R. 403); improper

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					character evidence (Evid.R. 404)
72	RRI_WK_000 04866		District 11 NR Report	D102	Irrelevant (Evid.R. 401) as to other properties and to elements of Plaintiff's TVPRA claim; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R. 404)
73	RRI_WK_000 00786		Case List for District 11	D104	Irrelevant (Evid.R. 401) as to other properties and to elements of Plaintiff's TVPRA claim; unfairly prejudicial (Evid.R. 403); improper character evidence (Evid.R. 404)

